

BellSouth Telecommunications, Inc.
Kentucky Public Service Commission
Docket No. 2001-105
SECCA's 1st Data Request
July 16, 2001
Item No. 10
Page 1 of 1

REQUEST: Provide each Form 477 filed by BellSouth with the FCC for Kentucky and for each other state in the BellSouth region.

RESPONSE: See Attachments.

Prepared by: Cathy Forbes

REQUEST: For the period reported in each Form 477 filed with the FCC, identify the number of unbundled loops by:

- A. Analog loops
- B. DS-1 unbundled loops
- C. DS-3 unbundled loops

RESPONSE: See BellSouth's response to SECCA Item 10, preceding.

Prepared by: Cathy Forbes

REQUEST: Provide, by quarter, the total number of minutes exchanged with CLECs form 1996 to the present.

RESPONSE: The total number of minutes exchanged with CLECs is not available for 1996 or 1997. Please see below for 1998 to the present.

MOUs BellSouth-Originated CLEC-Terminated

	1998	1999	2000	2001
1st qtr	110,132,179	424,550,780	818,270,999	1,209,896,063
2nd qtr	165,632,273	461,467,254	831,653,672	1,137,336,817
3rd qtr	224,767,012	612,411,677	894,097,905	
4th qtr	319,155,076	662,392,792	1,035,300,189	

MOUs CLEC-Originated BellSouth-Terminated

Kentucky CLEC Originated MOUs *				
	1998	1999	2000	2001
1st Qtr	2,587,200	34,538,234	56,101,667	82,538,685
2nd Qtr	6,902,807	22,937,838	58,209,258	55,307,240
3rd Qtr	13,963,571	27,286,266	56,183,136	
4th Qtr	27,240,779	28,550,298	55,757,890	

* The totals in this table include Local MOUs originated by CLECs and terminated to BellSouth as well as ISP MOUs originated by CLECs that are bound for the Internet through Internet Service Providers served by BellSouth.

REQUEST: Provide, by quarter, the total number of local, intraLATA and interLATA minutes originated by BellSouth customers in Kentucky from 1996 to the present.

RESPONSE: The information requested is not available. Specifically, BellSouth does not track originating local, intraLATA or interLATA minutes as a routine part of the management of the business. BellSouth does track total originating and terminating MOUs for intrastate interLATA. The following numbers are for the state of Kentucky:

	<u>1996</u>	<u>1997</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>	<u>2001</u>
1st Qtr	242,222	276,551	321,514	361,830	352,545	362,338
2 nd Qtr	255,661	298,701	343,933	358,475	339,739	350,717
3 rd Qtr	261,894	310,915	361,523	379,083	348,436	
4 th Qtr	271,530	314,646	359,288	341,897	359,024	

Prepared by: Eugene Glenn

REQUEST: Identify precisely how each of BellSouth's charges for optional daily usage files and access daily usage files are applied. Is BellSouth currently assessing these charges? If yes, when did BellSouth begin to apply these charges?

RESPONSE: Each day the Daily Usage File process accumulates the volumes of messages and magnetic tapes sent to each CLEC for the three interfaces (ODUF, ADUF and EODUF). At the end of the month, entries are made in the "Other Charges and Credits" section of the appropriate invoice for each CLEC based on the rates for the customer and the accumulated volumes. The following rate elements are billed, as appropriate:

- ADUF Message Processing per Message
- ADUF Transmission (Connect: Direct) per message
- EODUF Message Processing per Message
- ODUF Recording per Message (Facility Based only)
- ODUF Message Processing per message
- ODUF Message Processing, per Magnetic Tape Provisioned
- ODUF Data Transmission (Connect: Direct) per message

BellSouth is currently assessing each of these elements as it has been, with the exception of the EODUF Message Processing charge, since mid-1998. Message processing charges for EODUF began in late-1998, as that product was made available for CLEC use.

Prepared by: David Scollard

REQUEST: Does BellSouth support any particular expedited dispute resolution procedure? If so, describe in detail that procedure.

RESPONSE: BellSouth participates in dispute resolution procedures as required by various regulatory bodies for certain circumstances. However, initially disputes should be escalated within each company to the person who has ultimate authority for the subject matter in an effort to achieve a resolution. If the dispute cannot be resolved between the companies, then either party to the dispute may file a formal complaint with the Commission.

BellSouth's Standard Interconnection Agreement, as well as specific company Interconnection Agreements, provide for a dispute resolution procedure as well as a process for expediting issues.

Prepared by: Cindy Cox/Patti Klein

- REQUEST: Provide by year, for each of the last five years, the number of minutes interchanged between BellSouth and CLEC networks in Kentucky. Separately identify:
- A. The number of minutes originating with CLEC customers and terminating with BellSouth.
 - B. The number of minutes originating with BellSouth and terminating on CLEC networks.

RESPONSE: The total number of minutes exchanged with CLECs originating from BellSouth is not available for 1996 or 1997. Please see below for 1998 to the present. This data was obtained from the same source as the data supplied in the response to Item No. 12.

A. MOUs CLEC-Originated BellSouth-Terminated

The totals shown below include Local MOUs originated by CLECs and terminated to BellSouth as well as ISP MOUs originated by CLECs that are bound for the Internet through Internet Service Providers served by BellSouth.

1998	50,694,357
1999	113,312,636
2000	226,252,051
2001 thru June	137,845,925

B. MOUs BellSouth-Originated CLEC-Terminated

1998	819,686,540
1999	2,160,822,503
2000	3,579,322,765
2001 thru June	2,347,232,880

REQUEST: For each of the past five years, provide the number of minutes interchanged between BellSouth and CMRS networks in Kentucky. Separately identify:

- A. The number of minutes originating with CMRS customers and terminating with BellSouth.
- B. The number of minutes originating with BellSouth and terminating on CMRS networks.

RESPONSE: A. The total number of minutes exchanged with CMRS originating from BellSouth is not available for 1996 and 1997. Please see below for 1998 to the present:

MOUs CMRS Originated-BellSouth-Terminated - (Contract Billed Only)

1998	Not Available
1999	406,263,585
2000	568,214,914
2001 thru May	280,460,252

B. MOUs BellSouth-Originated CMRS-Cellular/CMRS-Paging Terminated CMRS-Cellular

1998	64,915,939
1999	90,846,112
2000	274,135,437
2001 thru April	89,378,912

Prepared by: David Scollard/Richard McIntire

REQUEST: Provide for each of the last five years, the total number of BellSouth's Kentucky:

- A. Local minutes
- B. Local calls
- C. IntraLATA toll minutes
- D. IntraLATA toll calls
- E. InterLATA access minutes
- F. InterLATA access calls

RESPONSE: For B., D. and F., BellSouth does not track local, intraLATA or interLATA messages as a routine part of the management of the business.

For A., C. and E., see the response to Item No. 13 preceding.

Prepared by: Eugene Glenn

REQUEST: Provide the annual revenue received by BellSouth in Kentucky for each of the past five years:

- A. For the lease of UNEs.
- B. For the provision of resold services

RESPONSE: Please see the regulated revenues in the table below:

<u>Year</u>	<u>UNE</u>	<u>Resold Services</u>
1996	N/A	N/A
1997	\$ 34,030	\$ 1,218,538
1998	\$ 249,150	\$10,484,511
1999	\$2,010,162	\$16,412,253
2000	\$5,521,143	\$19,040,227

RESPONSE PROVIDED BY: T. F. Lohman

REQUEST: Provide the number of switched access lines in Kentucky in each of the deaveraged UNE zones.

RESPONSE:

Zone 1	809,715
Zone 2	372,714
Zone 3	77,866

Prepared by: Tom Walden

REQUEST: Provide all workpapers underlying the Wakeling Affidavit, including a copy of all proprietary exhibits.

RESPONSE: See attachments. A supplemental response will be provided that relates to additional work papers supporting the collocation exhibits.

Prepared by: Victor Wakeling

REQUEST: Provide the number of interconnection trunks between BellSouth and CLECs in Kentucky separately identified between:

- A. One way trunks delivering CLEC originated traffic to BellSouth;
- B. One way trunks delivering BellSouth originated traffic to CLECs;
- C. Two way trunks between BellSouth and CLECs; and
- D. Any other type of interconnection trunk, with a brief description explaining its function.

RESPONSE:

Category	Type Trunks	Trunks In Service (June 2001)	
		Total BellSouth	Kentucky
Interconnection	1 Way: BLS to CLEC	745,884	34,218
	1 Way: CLEC to BLS	187,241	4,449
	2 Way	229,199	4,731
Operator Services	Directory Assistance	3,021	65
	Toll and Assistance	3,117	65
	Verification	524	2
Emergency Services	911/E911	4,807	100
Intercept Services	Intercept	176	6
Total		1,173,969	43,636

Prepared by: Keith Milner

REQUEST: To the extent that Mr. Milner and Mr. Wakeling's reported number of resold lines, UNE loops and UNE Loop/Port Combinations differ, please provide:

- A. A listing of each type of arrangement counted by Mr. Milner and/or Wakeling that is not considered by the other;
- B. The exact number of lines in each category identified in (a) above;
- C. An explanation as to why one witness includes the category in (a) above and the other does not;
- D. Identify whether the category is included/not-included in BellSouth's Form 477 Reports to the FCC; and
- E. For any category not included by BellSouth in its Form 477 reports to the FCC, explain why the category is not included.

RESPONSE:

- A. There are no significant differences in the lines counted by Messrs. Milner and Wakeling. Mr. Milner's Exhibit WKM-9 shows the count of resold "units" for the top fifty services available for resale ("Top 50"), which includes most types of resold lines. Item numbers 1, 2, 3, 9, 14, 17, 18, 19, 24, 25, 27, 28, 33, and 34 in Exhibit WKM-9 are resold lines. Mr. Wakeling only counts the items for the list of CLECs shown in his exhibits. Another difference arises between Mr. Wakeling's source data (which requires customer specific information) and Mr. Milner's source data (which is not customer specific), i.e. billed versus booked data sources. In addition to the types of lines included in WKM-9, Mr. Wakeling also includes resold FCO/FX lines, toll terminals, Business Plus/Business Choice, and WATS lines.

In the course of reconciling the counts on these two exhibits, it was discovered that Mr. Wakeling's source data inadvertently included 154 resold "units" which should not have been counted as resold lines. When these 154 units are subtracted from Mr. Wakeling's Exhibit VW-3, the share of CLEC lines computed on his exhibit drops a minimal amount, from 7.3% to 7.2%. The Method 2 estimate (Exhibit VW-4) remains at 5.4%.

- B. For items listed in A above, all resold lines reflected in WKM-9 for Kentucky total 36,042 resold lines. Mr. Wakeling presents 34,733 resold lines for the list of CLECs in his Exhibit VW-3. The comparable number from Mr. Wakeling's source data that compares to Exhibit's WKM-9 resold lines is 34,032. The additional resold FCO/FX lines, toll terminals, Business Plus/Business Choice, and WATS lines accounted for a further 777 resold lines included in the Exhibit VW-3 total.

Mr. Milner states there are UNE loops in Kentucky totaling 5,330. Mr. Wakeling attributes 5,127 UNE loops to the list of CLECs shown in his Exhibit VW-3. Mr. Wakeling's count a) is associated with the CLECs identified in his Exhibit VW-6 and b) is based on an extract from the loop history table from the Work Force Administration system. Mr. Milner's slightly higher aggregate amount was extracted from billing systems. The same UNE loop categories are believed to be reflected in both.

Mr. Milner states there are UNE Combinations in Kentucky totaling 14,635. Mr. Wakeling attributes 14,307 UNE Combinations to the list of CLECs shown in his Exhibits VW-6 and VW-7. Again, Mr. Wakeling's slightly lower total is associated with the CLECs identified in his Exhibits versus Mr. Milner's "Top 50" count. The UNE-P categories for the Form 477, Mr. Wakeling's exhibits and Mr. Milner's amount all consist of Product Group 644 for residence and Product Group 681 for business.

- C. Answer included in A, B. above. The purpose of Mr. Milner's Exhibit WKM-9 is to demonstrate for the 271 checklist that CLECs are purchasing services for resale from BellSouth in sizable quantities. The point is amply made by showing only the top 50 types of resold units in WKM-9. Mr. Wakeling's exhibits are "bottoms up" approaches to demonstrating lines in Kentucky for the CLECs identified for purposes of Track A.
- D. BellSouth is attaching a display that shows the resold line USOCs included in the extract supporting Mr. Wakeling's Exhibits for March 2001. All of these USOCs are believed to be included in the Form 477. The resale line USOCs appear in the "LINE USOC" column. Confidential CPNI CLEC information is redacted. As explained in A above, the entry "# N/A" in the "LINE USOC"

column identifies a USOC that was originally included in Mr. Wakeling's Exhibits but has since been recognized as being included in error. The total of these erroneous USOCs (indicated as "# N/A") sums to the adjustment of -154 lines described in A above. As indicated above, Mr. Milner's resale count (top 50 resale items) and resale in Mr. Wakeling's Exhibits (for CLEC's identified) are not intended to be exactly the same as the Form 477 count. Total resold lines, UNE loops, and UNE Combinations are included in Form 477 Reports to the FCC. BellSouth believes it includes all the categories required by the Form 477 instructions.

E. See response to D.

In summary, the differences between amounts used by Mr. Milner and Mr. Wakeling are immaterial, and do not affect the conclusions presented in BellSouth's testimony/affidavit as filed.

Prepared by: Keith Milner/Victor Wakeling